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Attorneys for Defendant Monique Burns

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

Plaintiff,

v.

UNOPPOSED MOTION TO MODIFY
RELEASE CONDITIONS;
ORDER MODIFYING CONDITIONS OF
RELEASE

MONIQUE BURNS,

Defendant.

By and through counsel, defendant Monique Burns respectfully requests that her release conditions in this case be modified, as follows:

1. The defendant is permitted to travel to Tucson, Arizona for a period of four days – May 28, 2012 through and including May 31, 2012.
2. **All other conditions will remain in effect.**

The reason for this request for a modification of travel restrictions is that Ms. Burns would like to assist her son move into his college apartment in Arizona. Ms. Burns' son is

1 currently a freshman in college. Ms. Burns will drive her son, and his belongings, to Arizona and
2 help him move from his dorm room into an apartment. Ms. Burns has rented a car – the make,
3 model and license plate of the vehicle they are using will be provided to Pretrial Services. While
4 in Arizona, she will stay at the Holiday Inn Express Hotel at 630 East Wetmore Road in Tucson.
5 The phone number for the Holiday Inn Express is (520) 202-5000.
6

7 Pretrial Services Officer Paul Marmaril has been contacted, and he has no opposition to
8 this modification. In addition, United States Attorney Kevin Barry has been contacted, and he
9 has no objection to the request, given the approval of Pretrial Services.
10

11 The undersigned, Camellia Baray, declares under penalty of perjury that the foregoing is
12 true and correct to the best of her information and belief.
13

14 Dated: May 23, 2012

Respectfully submitted,

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16 BONJOUR, THORMAN,
BARAY & BILLINGSLEY,
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18 /S/
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20 CAMELLIA BARAY
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UNITED STATES OF AMERICA,

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Plaintiff,

v.

~~PROPOSED~~ ORDER MODIFYING
CONDITIONS OF RELEASE

MONIQUE BURNS,

Defendant.

_____ /

Based on the approval of the parties and good cause appearing therefore, it is
ORDERED that the defendant's release conditions be modified as follows:

1. The defendant be permitted to travel to Tucson, Arizona from May 28, 2012 to
May 31, 2012.

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Unopposed Motion to Modify Release Conditions
And Proposed Order
No. CR 3-12-mj-70126 MEJ

2. All other conditions will remain in effect.

Dated: May 25, 2012



The Honorable ~~Joseph C. Spero~~ Maria-Elena James
United States Magistrate Judge